

The Honorable David G. Estudillo

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

PAUL D. ETIENNE, et al.,

Plaintiffs,

v.

ROBERT W. FERGUSON, et al.,

Defendants.

NO. 3:25-cv-05461-DGE

DECLARATION OF KELLY A.
PARADIS IN SUPPORT OF
RESPONSE OF DEFENDANTS
ROBERT W. FERGUSON AND
NICHOLAS W. BROWN TO
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

NOTE ON MOTION CALENDAR:
July 14, 2025 at 10:00 a.m.

I, Kelly A. Paradis, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing Defendants Robert W. Ferguson and Nicholas W. Brown in the above-captioned matter.

2. Attached as **Exhibit 1** is a true and correct copy of a website from the Centers for Disease Control and Prevention, titled "About Child Abuse and Neglect", located at the following link: https://www.cdc.gov/child-abuse-neglect/about/index.html#cdc_behavioral_basics_quick-quick-facts-and-stats, last accessed on June 29, 2025.

3. Attached as **Exhibit 2** is a true and correct copy of website from the Centers for Disease Control and Prevention, titled "About Child Sexual Abuse", located at the following

link: <https://www.cdc.gov/child-abuse-neglect/about/about-child-sexual-abuse.html>, last accessed on June 29, 2025.

4. Attached as **Exhibit 3** is a true and correct copy of a website from the National Center for Victims of Crime, titled “Child Sexual Abuse Statistics”, located at the following link: <https://victimsofcrime.org/child-sexual-abuse-statistics/>, last accessed on June 29, 2025.

5. Attached as **Exhibit 4** is a true and correct copy of a website from the American Society for the Positive Care of Children, titled “National Child Maltreatment Statistics”, located at the following link: <https://americanspcc.org/child-maltreatment-statistics/>, last accessed on June 29, 2025.

6. Attached as **Exhibit 5** is a true and correct copy of a website from the National Children’s Alliance, titled “National Statistics on Child Abuse”, located at the following link: <https://www.nationalchildrensalliance.org/media-room/national-statistics-on-child-abuse/>, last accessed on June 29, 2025.

7. Attached as **Exhibit 6** is a true and correct copy of U.S. Department of Health & Human Services 2023 Child Maltreatment report, located at the following link: <https://acf.gov/sites/default/files/documents/cb/cm2023.pdf>, last accessed on June 29, 2025.

8. Attached as **Exhibit 7** is a true and correct copy of a printout of the Office of Innovation, Alignment and Accountability Prevention Dashboard showing a count of children in CPS intakes by referral type, located at the following link: https://public.tableau.com/app/profile/dcyfoiaa/viz/OIAAPreventionDashboardV1_16/CPSReferentType, last accessed on June 29, 2025.

9. Attached as **Exhibit 8** is a true and correct copy of a printout of the Office of Innovation, Alignment and Accountability Prevention Dashboard showing a count of children in CPS intakes by referral type, filtered to show only those with a “screen in” decision, located at the following link: https://public.tableau.com/app/profile/dcyfoiaa/viz/OIAAPreventionDashboardV1_16/CPSReferentType, last accessed on June 29, 2025.

10. Attached as **Exhibit 9** is a true and correct copy of a report from the Department of Social and Health Services, Research and Data Analysis Division, titled “Child Welfare and Health Service Trends in Washington State”, located at the following link: <https://www.dshs.wa.gov/sites/default/files/rda/reports/DCYF covid.pdf>, last accessed on June 29, 2025.

11. Attached as **Exhibit 10** is a true and correct copy of a news article from InvestigateWest, located at the following link: <https://www.investigatwest.org/investigatwest-reports/jehovahs-witnesses-covered-up-child-sexual-abuse-in-washington-state-for-decades-lawsuit-alleges-17692697>, last accessed on June 29, 2025.

12. Linked in **Exhibit 11** is a true and correct copy of the March 14, 2025 House Early Learning & Human Services Committee hearing, available at: <https://tvw.org/video/house-early-learning-human-services-2025031189/?eventID=2025031189>, last accessed on June 29, 2025.

13. Linked in **Exhibit 12** is a true and correct copy of the February 5, 2025 Senate Human Services Committee hearing, available at <https://tvw.org/video/senate-human-services-2025021111/?eventID=2025021111>, last accessed on June 29, 2025.

14. Attached as **Exhibit 13** is a true and correct copy of a website from Prevent Child Abuse America, titled “Child Abuse and Domestic Violence: Connections and Common Factors”, available at the following link: <https://preventchildabuse.org/latest-activity/child-abuse-and-domestic-violence-connections-and-common-factors/>, last accessed on June 29, 2025.

15. Attached as **Exhibit 14** is a true and correct copy of the House Bill Report for SHB 1171, available at the following link: <https://lawfilesexst.leg.wa.gov/biennium/2025-26/Pdf/Bill%20Reports/House/1171-S%20HBR%20PL%2025.pdf?q=20250630094111>, last accessed on June 30, 2025.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 30th day of June 2025 at Seattle, Washington.

4 /s/ Kelly A. Paradis

5 KELLY A. PARADIS, WSBA #47175

6 Deputy Solicitor General
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